

CHRISTOPHER A. NEDEAU (SBN 81297)  
 cnedeau@nossaman.com  
 CARL L. BLUMENSTEIN (SBN 124158)  
 cblumenstein@nossaman.com  
 JAMES A. NICKOVICH (SBN 244969)  
 jnickovich@nossaman.com  
 NOSSAMAN LLP  
 50 California Street, 34th Floor  
 San Francisco, CA 94111-4624  
 Telephone: (415) 398-3600  
 Facsimile: (415) 398-2438

Attorneys for Defendants  
 AU Optronics Corporation and  
 AU Optronics Corporation America

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL)  
 ANTITRUST LITIGATION

Case No. 3:07-MD-1827 SI  
 MDL No. 1827

STATE OF MISSOURI, *ex rel.*  
 Chris Koster, Attorney General, *et al.*,

STATE OF ARKANSAS, *ex rel.*  
 Dustin McDaniel, Attorney General, *et al.*,

STATE OF MICHIGAN, *ex rel.*  
 Bill Schuette, Attorney General, *et al.*,

STATE OF WEST VIRGINIA, *ex rel.*  
 Darrell McGraw, Attorney General, *et al.*,

STATE OF WISCONSIN, *ex rel.*  
 J.B. Van Hollen, Attorney General, *et al.*

STATE OF FLORIDA, OFFICE OF THE  
 ATTORNEY GENERAL, DEPARTMENT OF  
 LEGAL AFFAIRS,

Plaintiff,

vs.

AU OPTRONICS CORPORATION, *et al.*

Defendants.

Case No. 3:10-cv-03619 SI

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER REGARDING EXTENSION  
 OF TIME ON DEADLINES IN CASE  
 SCHEDULE**

Case No. 3:10-cv-03517 SI

WHEREAS, the States of Missouri, Arkansas, West Virginia, Michigan, and Wisconsin (collectively, the “5-States Plaintiffs”) and AU Optronics Corporation and AU Optronics Corporation America (collectively, “AUO”), LG Display Co., Ltd. and LG Display America, Inc. (collectively, “LG Display”)(AUO and LG Display collectively, the “5-States Defendants”), wish to extend certain deadlines entered in the Court’s July 14, 2011 Modifying Pretrial Schedule for Track One DAPs and AG Cases (Dkt No. 3110) for the purposes of the 5-States action, Case No. 3:10-cv-03619;

WHEREAS, the State of Florida (the “Florida Plaintiff”) and Toshiba Corporation, Toshiba Mobile Display Co., Ltd., Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc. (collectively, the “Toshiba Entities”), and the 5-States Defendants (collectively, the “Defendants”) wish to extend certain deadlines entered in the Court’s July 14, 2011 Modifying Pretrial Schedule for Track One DAPs and AG Cases (Dkt No. 3110) for the purposes of the Florida action, Case No. 3:10-cv-03517, only;

WHEREAS, the 5-States Plaintiffs and the Florida Plaintiff (collectively, the “States”) as well as the Defendants have negotiated in good faith regarding temporary extensions for certain fact and expert discovery deadlines, and wish to achieve a global resolution extending outstanding deadlines for motions to compel fact discovery, expert discovery and reports, and dispositive motions and related briefing,

WHEREAS, the States and the Defendants intend to keep the November 5, 2012 trial date;

NOW THEREFORE, the parties stipulate and agree as follows:

1. The States’ and the Defendants’ mutual deadline for responding to pending fact discovery will be moved from December 8, 2011 to January 10, 2012. The parties maintain all objections and defenses in responding to fact discovery that they would have had in the absence of this stipulation. This stipulation will not preclude subpoenaed non-parties from producing responsive documents and information after January 10, 2012.

2. This stipulation does not allow new fact discovery of any sort to be served beyond the current fact discovery cut-off date of December 8, 2012 (*e.g.*, issuance of new written discovery requests, new nonparty subpoenas, more depositions, etc.). If there are particular state-specific issues (such as the Wisconsin deposition currently scheduled for December 21, 2012), then those issues may be

worked out separately among the affected parties. Any such individual, state-specific stipulations regarding fact discovery between the States and the Defendants would take priority over this stipulation.

3. The new period for completing fact discovery does not preclude the parties from moving to compel or otherwise seeking judicial intervention with respect to disputes about the pending discovery requests after January 10, 2012.

4. All of the current deadlines as to the States and the Defendants in the Court's July 14, 2011 Modifying Pretrial Schedule for Track One DAPs and AG Cases (Dkt No. 3110), with the exception of the deadlines for the Pretrial Conference and Trial, are extended 30 days.

Respectfully Submitted,

DATED: December 14, 2011

Christopher A. Nedeau  
Carl L. Blumenstein  
James A. Nickovich  
NOSSAMAN LLP  
50 California Street, 34<sup>th</sup> Floor  
San Francisco, CA 94111  
Telephone: (415) 398-3600  
Facsimile: (415) 398-2438

By: /s/ Christopher A. Nedeau  
Attorneys for Defendants AU Optronics Corporation  
and AU Optronics Corporation America

Christopher M. Curran (pro hac vice)  
John H. Chung (pro hac vice)  
Martin M. Toto (pro hac vice)  
Kristen J. McAhren (pro hac vice)  
WHITE & CASE LLP  
1155 Avenue of the Americas  
New York, NY 10036  
(212) 819-8200 (telephone)  
(212) 354-811 (facsimile)  
ccuran@whitecase.com  
jchung@whitecase.com  
mtoto@whitecase.com  
kmcahren@whitecase.com

By /s/ Kristen J. McAhren  
Attorneys for Defendants Toshiba Corporation,  
Toshiba Mobile Display Co., Ltd., Toshiba America  
Electronic Components, Inc., and Toshiba America  
Information Systems, Inc.

Michael R. Lazerwitz (pro hac vice)  
Jeremy J. Caslyn (SBN 205062)  
Lee F. Berger (SBN 222756)  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
One Liberty Plaza  
New York, NY 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 225-3999

By: /s/ Michael R. Lazerwitz  
Attorneys for Defendant LG Display Co. Ltd.  
and LG Display America, Inc.

Anne E. Schneider  
Andrew M. Hartnett  
OFFICE OF THE MISSOURI ATTORNEY GENERAL  
P.O. Box 899  
Jefferson City, MO 65102  
Telephone: (573) 751-3321  
Facsimile: (573) 751-2041

By /s/ Anne E. Schneider  
Attorneys for the State of Missouri

David A. Curran  
OFFICE OF THE ARKANSAS ATTORNEY GENERAL  
323 Center Street, Suite 500  
Little Rock, AR 72201  
Telephone: (501) 682-2007  
Facsimile: (501) 682-8118

By /s/ David A. Curran  
Attorneys for Plaintiff State of Arkansas

M. Elizabeth Lippitt  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF MICHIGAN  
525 West Ottawa Street, 6<sup>th</sup> Floor  
Lansing, MI 48933  
Telephone: (517) 373-1160  
Facsimile: (517) 335-1935

By /s/ M. Elizabeth Lippitt  
Attorneys for Plaintiff State of Michigan

Douglas Davis  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF WEST VIRGINIA  
812 Quarrier Street, 1<sup>st</sup> Floor  
Charleston, WV 25301  
Telephone: (304) 558-8986  
Facsimile: (304) 558-0184

By /s/ Douglas Davis  
Attorneys for Plaintiff State of West Virginia

Gwendolyn J. Cooley  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF WISCONSIN  
P.O. Box 7857  
Madison, WI 53707  
Telephone: (608) 261-5810  
Facsimile: (608) 267-2778

By /s/ Gwendolyn J. Cooley  
Attorneys for Plaintiff State of Wisconsin

R. Scott Palmer  
Lizabeth A. Brady  
Nicholas J. Weilhammer  
Eli Friedman  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF FLORIDA  
NPL-01, The Capitol  
Tallahassee, FL 32399-1050  
Telephone: (850) 414-3300  
Facsimile: (850) 488-9134


By /s/ Nicholas J. Weilhammer  
Attorneys for the State of Florida

Attestation: Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document have been obtained from each of the signatories.

**ORDER**

IT IS SO ORDERED.

Dated: 12/16/11

  
The Honorable Susan Illston  
Judge of the United States District Court